

**NORTHERN TELECOM INC.**

**Interest:** Equipment manufacturer arguing that the FCC should reinstate provisions of the WINForum Spectrum Etiquette that were modified.

**Duplex Devices:** The provisions enabling duplex operation should be reinstated. (23-26)

**Packing Rule:** The packing rule should be deleted. (23-26)

**Emissions Limits:** The emissions limits should be clarified to avoid imposing unnecessary and excessive costs; the power measurement provision adopted will constrain the use of certain technologies and the frequency stability requirements add unjustified costs to products. (23-26)

**Channel Monitoring Rules:** The time limit for responses from mobiles should be increased to 30 seconds to allow use of battery-saving technologies. (23-26)

**Other:** The deletion of the provision related to multicarrier shared-antenna provision will deprive the public of the benefits of these technologies and increase overall infrastructure costs. (23-26)

## ROCKWELL INTERNATIONAL CORPORATION

**Interest:** Equipment manufacturer.

### **Channelization and Access Rules:**

- The FCC should remove the fixed segmentation requirements in both of the isochronous spectrum blocks to allow compatibility with standards developed at the Joint Technical Committee on PCS Wireless Access. (3-5)
- The "listen-before-talk" period and corresponding frame time should be increased from 10 ms to 20 ms to allow a more flexible range of devices without having a significant impact on channel setup time. (5-6)

**Packing Rule:** The "packing" rule in Section 15.321(b) should be modified to require devices with an emissions bandwidth  $\leq 2.5$  MHz to start searching 2-3 MHz from the licensed PCS band edge and search upwards and devices with an emissions  $\geq 2.5$  MHz should start searching 2-3 MHz from the licensed PCS band edge and search downwards. (7-9)

**Cooperating Devices:** The FCC should limit devices to occupying no more than 50 percent of the bandwidth in each isochronous spectrum block to allow compatibility with standards developed at the Joint Technical Committee on PCS Wireless Access. (3-5)

## SPECTRALINK CORPORATION

**Interest:** Manufacturer of radio devices.

**Band Plan:** In order to assure manufacturers' ability to produce high quality, efficiently engineered isochronous devices, the Commission should allocate 20 MHz of contiguous spectrum for isochronous devices. (10-13)

**Channelization and Access Rules:** The 1 second limit on unacknowledged transmissions in Section 15.321(c)(4) should be raised to 30 seconds in recognition of the delays a 1 second limit would cause during time where significant channel access activity is occurring. (8-9)

**Duplex Devices:** Section 15.321(c) should be amended to allow duplex mobile devices to respond on the same channel the base station has "cleared" to facilitate duplex operation. (6-7)

**Packing Rule:** The "packing" rule in Section 15.321(b) should be eliminated in its entirety since the effect of the rule is to delay the onset of transmissions with no corresponding benefit. (9-10)

**Channel Monitoring Rules:** In order to avoid precluding multi-cell systems from operating in high density, high noise environments due to self-created noise, Section 15.321(c) should be modified to allow systems to transmit over noise or interference that can be decoded and identified (*i.e.*, determined to belong to the transmitting system), even if the noise floor exceeds the KTB +50 dB monitoring threshold. (4-6).

## TELOCATOR

**Interest:** Trade association of PCS interests.

**Channelization and Access Rules:** The 10 ms period specified in the "listen-before-talk" rule should be increased to 20 ms. (20)

## UTAM, INC.

**Interest:** FCC designated coordinator for the transition of 2 GHz spectrum from fixed microwave service to unlicensed PCS.

**Coordinatable Devices:** The FCC should clarify that it did not require all coordinatable unlicensed PCS systems and devices to incorporate technical mechanisms that would prevent premature activation prior to UTAM verification of installation at the coordinated location. Rather, the FCC should permit manufacturers to establish procedures (such as the use of licensed installers) to prevent premature activation. (5,6)

**Measurement and Certification Procedures:** The FCC should clarify that it will determine whether a particular unlicensed PCS system or device meets the requirements of the rules for coordinatable devices in the equipment authorization process. (6,7)

## UTILITIES TELECOMMUNICATIONS COUNCIL

**Interest:** Organization whose members operate private microwave systems in band affected by the Order. (2-3)

**Labelling Requirements:** Recommends more specific labelling of unlicensed PCS devices to ensure that consumers know that the equipment cannot be relocated without coordination and that a toll-free telephone number be placed on the label so that consumers can contact UTAM easily. (15)

### **Coordinatable Devices:**

- The definition of "coordinatable PCS device" is ambiguous. The FCC should make a more specific definition. (12-13)
- UTAM should not have the authority to designate whether a device is coordinatable. Similarly, the FCC should clarify that UTAM will be held fully responsible for verifying the installation or relocation of "coordinatable" PCS devices. The FCC should ensure that technological means are incorporated to ensure that an unlicensed PCS device may not be installed or relocated without prior coordination with UTAM. (13-14)

## **WIRELESS INFORMATION NETWORKS FORUM ("WINFORUM")**

**Interest:** Trade association of equipment manufacturers interested in unlicensed PCS devices.

**Band Plan:** Supports the allocation of 40 MHz for unlicensed PCS and the adoption of technical rules that are based on WINForum's Spectrum Etiquette. (2)

**Channelization and Access Rules:** Increase from 1 to 30 seconds the limitation for control and signalling information to accommodate devices that require more time for call set-up and administration. (4)

**Duplex Devices:** Permit the operation of devices that establish a duplex path on a single, common channel. (6)

**Packing Rule:** Remove the isochronous packing rule since it would likely degrade quality. (4,5)

**Emissions Limits:** Clarify the rules for emission limits by specifying the bandwidth over which emissions are to be measured. In addition, states that adjacent channel emissions should be attenuated by 30 dB rather than the adopted 40 dB value. (5)

**Power Limits:** Measure power over the peak of the mean power during an interval of transmission and limit the peak envelope power to 10 dB above the transmit power. (6)